



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 22, 2021

BY EMAIL AND ECF

Honorable Denise L. Cote
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Naheem Escort, 21 Cr. 387 (DLC)*

Dear Judge Cote:

The parties write in response to the Court's order earlier today that directed the parties to confer about possible arrangements that could be made to prevent the need for Officer Kristian Hued-Castro to appear at trial. After discussion, the parties have agreed that a deposition taken pursuant to Rule 15 of the Federal Rules of Criminal Procedure would obviate the need for Officer Hued-Castro to be present at trial. The parties therefore request, pursuant to Rule 15(h), that the Court permit a deposition of Officer Hued-Castro and that the parties be permitted to introduce the video recording and/or transcript of the deposition as permitted by Rule 15(f) and the Federal Rules of Evidence.

Granted and so ordered.

Denise Cote

10/22/21

Respectfully Submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/

Matthew Weinberg
Andrew Jones
Andrew C. Adams
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(212) 637-2386

cc: Neil Kelly and Sylvie Levine, Federal Defenders of New York (by ECF and Email)